

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ANTHONY BACON,	:	VIOLATIONS:
a/k/a "Basir Brown"	:	18 U.S.C. § 922(g)(1) (Possession of a
	:	firearm by a convicted felon) - 2 counts
	:	21 U.S.C. § 841(a)(1) (Possession with
	:	intent to distribute cocaine base
	:	("crack")) - 2 counts
	:	18 U.S.C. § 924(c)(1) (Possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime) - 2 counts
		Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 24, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

ANTHONY BACON,
a/k/a "BASIR BROWN,"

having previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a 9 millimeter Glock handgun, serial number DGB076US, loaded with 11 live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 24, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ANTHONY BACON,
a/k/a "BASIR BROWN,"**

knowingly and intentionally possessed with intent to distribute more than five grams, that is
approximately 7.30 grams, of a mixture or substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 24, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ANTHONY BACON,
a/k/a “BASIR BROWN,”**

knowingly possessed a firearm, that is, a 9 millimeter handgun, serial number DGB076US, in
furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United
States, that is, possession with intent to distribute a controlled substance in violation of Title 21,
United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY CHARGES THAT:

On or about May 22, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ANTHONY BACON,
a/k/a "BASIR BROWN,"**

having previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a 10 millimeter Glock handgun, serial number CDK119, loaded with eight rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ANTHONY BACON,
a/k/a "BASIR BROWN,"**

knowingly and intentionally possessed with intent to distribute more than five grams, that is
approximately 5.032 grams, of a mixture or substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2003, in Philadelphia, at the Eastern District of Pennsylvania,
defendant

**ANTHONY BACON,
a/k/a "BASIR BROWN,"**

knowingly possessed a firearm, that is, a 10 millimeter Glock handgun, serial number CDK119,
in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United
States, that is, possession with intent to distribute a controlled substance in violation of Title 21,
United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), set forth in this Indictment, the defendant

**ANTHONY BACON,
a/k/a “BASIR BROWN,”**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (1) a 9 millimeter Glock handgun, serial number DGB076US, and 11 live rounds of ammunition.
- (2) a 10 millimeter Glock handgun, serial number CDK119, and eight live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney